

SUBJECT TO PROTECTIVE ORDER

Contents hereof are subject to a court-ordered protective order governing its use and dissemination

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

UMB Bank, N.A., as Trustee,

Plaintiff,

- against -

SANOFI,

Defendant.

No. 15 Civ. 08725 (GBD) (RWL)

**DECLARATION OF ADAM S. MINTZ IN SUPPORT OF PLAINTIFF'S
MOTION FOR SUMMARY JUDGMENT AS TO
COUNTS I, II AND VII OF THE SECOND AMENDED COMPLAINT**

I, Adam S. Mintz, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct:

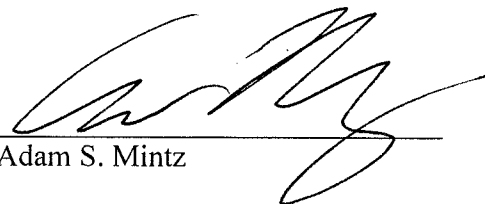
1. I am admitted to the bars of the State of New York and this Court. I am an attorney at the law firm of Cahill Gordon & Reindel LLP, counsel for the Plaintiff, UMB Bank, N.A., as Trustee, in this action. I make this declaration in support of Plaintiff's Motion for Summary Judgment as to Counts I, II and VII of the Second Amended Complaint.

2. I submit this declaration to place before the Court certain documents referenced in the Statement of Undisputed Material Facts in Support of Plaintiff's Motion for Summary Judgment as to Counts I, II and VII of the Second Amended Complaint. These documents are listed in Exhibit A.

3. True and correct copies of the documents listed in Exhibit A are attached hereto. Due to the size of certain exhibits, certain of these documents are excerpted for the Court's convenience, as indicated in Exhibit A. We will provide complete copies of the excerpted documents at the Court's request.

I declare under penalty of perjury pursuant to 28 U.S.C. Section 1746 that the foregoing is true and correct.

Dated: September 13, 2019




Adam S. Mintz

SUBJECT TO PROTECTIVE ORDER

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Exhibit A

**TABLE OF EXHIBITS REFERENCED IN
LOCAL RULE 56.1 STATEMENT IN SUPPORT OF PLAINTIFF'S MOTION FOR SUMMARY
JUDGMENT**

Exhibit	Description	Partial Exhibit¹	Filed Under Seal²
1.	Plaintiff's Exhibit 106, Contingent Value Rights Agreement by and between Sanofi-Aventis and American Stock Transfer & Trust Company, LLC, dated March 30, 2011		
2.	<i>Our History</i> , UMB FINANCIAL CORPORATION WEBSITE, available at https://www.umb.com/personal/aboutumb/company/our-history , last visited August 28, 2019		
3.	<i>About Us</i> , SANOFI WEBSITE, available at https://www.sanofi.com/en/about-us/sanofi-at-a-glance , last visited July 31, 2019		
4.	<i>Investors Contacts</i> , SANOFI WEBSITE, available at https://www.sanofi.com/en/investors/contact , last visited August 28, 2019		
5.	<i>About Us</i> , SANOFI GENZYME WEBSITE, available at https://www.sanofigenzyme.com/en/about-us , last visited August 28, 2019		
6.	<i>Genzyme Confirms Receipt of Unsolicited Proposal</i> , SANOFI GENZYME WEBSITE (Aug. 30, 2010), available at https://www.sanofigenzyme.com/en/about-us/newsroom/archive/2010/2010-08-30-07-37-00 , last visited September 12, 2019		
7.		Excerpted (SAN-CVR 017217439 to SAN-CVR 017217487)	Yes

¹ For documents not submitted in full, this column identifies the document as "Excerpted" and, where applicable, provides the pages of the complete document. All other exhibits are submitted in full.

² Exhibits filed under seal are denoted with a "Yes." Partially redacted exhibits are denoted with "Redacted." All other exhibits are filed publicly.



Exhibit	Description	Partial Exhibit ¹	Filed Under Seal ²
8.	Genzyme Corporation, Schedule 14D-9, Solicitation/Recommendation Statement Pursuant to Section 14(d)(4) of the Securities Exchange Act of 1934, dated March 7, 2011, available at https://www.sec.gov/Archives/edgar/data/732485/000095012311022458/b85369sc14d9za.htm , last visited September 12, 2019		
9.		Excerpted (SAN-CVR 013900085 to SAN-CVR 013900095)	Yes
10.	Agreement and Plan of Merger among Sanofi-Aventis, GC Merger Corp. and Genzyme Corporation, dated February 16, 2011, available at https://www.sec.gov/Archives/edgar/data/732485/000095012311014482/b85002exv2w1.htm , last visited September 12, 2019		
11.	<i>Sanofi-Aventis Successfully Completes Exchange Offer for Genzyme Corporation</i> , PR NEWswire (April 4, 2011) available at https://www.prnewswire.com/news-releases/sanofi-aventis-successfully-completes-exchange-offer-for-genzyme-corporation-119161914.html , last visited September 12, 2019		
12.	<i>Sanofi to Buy Genzyme for more than \$20 Billion</i> , REUTERS (February 16, 2011) available at https://www.reuters.com/article/us-genzyme-sanofi-idUSTRE71E4XI20110216 , last visited September 12, 2019		
13.			Yes
14.	Offer to Exchange Each Outstanding Share of Common Stock of Genzyme Corporation filed pursuant to Rule 424(b)(3), available at https://www.sec.gov/Archives/edgar/data/1121404/000119312511082363/d424b3.htm , last visited September 3, 2019		

Exhibit	Description	Partial Exhibit ¹	Filed Under Seal ²
15.	[REDACTED]		Yes
16.	[REDACTED]		Yes
17.	[REDACTED]	Excerpted (SAN-CVR 013574062 to SAN-CVR 013574346)	Yes
18.	Sanofi Form 20-F 2012, available at https://www.sanofi.com/-/media/Project/One-Sanofi-Web/Websites/Global/Sanofi-COM/Home/fr/publications/31972_20-F_2012_V2.pdf , last visited Sept. 11, 2019		
19.	Questions and Answers Regarding the CVR, available at https://www.sec.gov/Archives/edgar/data/732485/000095012311017162/b85162exv99waw43.htm , last visited September 11, 2019		
20.	Sanofi Form 20-F 2018, available at https://www.sanofi.com/-/media/Project/One-Sanofi-Web/Websites/Global/Sanofi-COM/Home/common/docs/investors/Sanofi-20-F-2018-EN-PDF-e-accessible_01.pdf , last visited September 11, 2019		
21.	Sanofi Form 20-F 2016, available at http://www.annualreports.com/HostedData/AnnualReportArchive/s/NYSE_SNY_2016.pdf , last visited September 11, 2019		
22.	Sanofi Form 20-F 2013, available at https://www.companyreporting.com/sites/default/files/annual-report-index/sanofi-aventis-annual-report-2013.pdf , last visited September 11, 2019		
23.	[REDACTED]		Yes








Exhibit	Description	Partial Exhibit ¹	Filed Under Seal ²
24.	Lemtrada Full Prescribing Information, revised October 2017, available at https://www.accessdata.fda.gov/drugsatfda_docs/label/2017/103948s5158lbl.pdf , last visited September 12, 2013	Excerpted	
25.	October 18, 2018 Videotaped Deposition of Olivier Brandicourt Pages 1, 6, 15, 44, 51, 52-54, 64-66, 80-81, 91, 97	Excerpted	Redacted
26.	August 29, 2018 Videotaped Deposition of Christopher Viehbacher Pages 1, 14, 47, 49, 59, 79, 93, 105, 114, 129-131, 136, 164-165, 235, 273, 326	Excerpted	Redacted
27.			Yes
28.			Yes
29.			Yes
30.			Yes
31.			Yes
32.			Yes
33.			Yes
34.	Aubagio Highlights of Prescribing Information, dated Sept. 12, 2012	Excerpted	

Exhibit	Description	Partial Exhibit ¹	Filed Under Seal ²
35.	Abstract, Teriflunomide, an Inhibitor of Dihydroorotate Dehydrogenase for the Potential Oral Treatment of Multiple Sclerosis (November 11, 2010)		
36.	<i>Dear Sanofi: Firing CEO Chris Viehbacher Is a Huge Mistake</i> , FORBES (October 29, 2014), available at https://www.forbes.com/sites/matthewherper/2014/10/29/dear-sanofi-firing-ceo-chris-viehbacher-is-a-huge-mistake/#4617521b75c0 , last visited September 12, 2019		
37.	October 18, 2018 Videotaped Deposition of Serge Weinberg Pages 1, 15, 18, 23, 47, 49-50, 84-85, 119	Excerpted	Redacted
38.	<i>Sanofi's CFO Contaminate to Retire Later this Year</i> , REUTERS (April 17, 2018) available at https://www.reuters.com/article/us-sanofi-management/sanofis-cfo-contaminate-to-retire-later-this-year-idUSKBN1HO2YQ , last visited September 12, 2019		
39.	November 7, 2018 Deposition of Dr. Elias Zerhouni Pages 1, 7, 40-41, 56-57, 114-115, 202, 304	Excerpted	Redacted
40.	<i>John Reed to Replace Zerhouni as Sanofi Head of Global R&D</i> , REUTERS (April 24, 2018) available at https://www.reuters.com/article/brief-john-reed-to-replace-zerhouni-as-s/brief-john-reed-to-replace-zerhouni-as-sanofi-head-of-global-rd-idUSFWN1S106D , last visited September 12, 2019		
41.	<i>Sanofi Appoints David Meeker Chief Executive Officer of Genzyme</i> , SANOFI GENZYME WEBSITE (October 24, 2011) available at https://news.genzyme.com/press-release/sanofi-appoints-david-meeker-chief-executive-officer-genzyme , last visited September 12, 2019		
42.	July 26, 2018 Deposition of David Meeker Pages 1, 10-12, 43, 92, 115, 298-299	Excerpted	Redacted
43.	June 14, 2018 Videotaped Deposition of Marc Esteva Pages 1, 14, 18-19, 28, 30, 114, 216	Excerpted	Redacted

Exhibit	Description	Partial Exhibit ¹	Filed Under Seal ²
44.	<i>Bill Sibold, Executive Vice President and Head of Sanofi Genzyme</i> , SANOFI GENZYME WEBSITE, available at https://www.sanofigenzyme.com/en/about-us/our-leadership/bill-sibold , last visited August 28, 2019		
45.	<i>Bill Sibold</i> , LINKEDIN, website, last visited August 29, 2019		
46.	July 31, 2018 Videotaped Deposition of Mark W. Underwood Pages 1, 9, 10, 200, 281-282	Excerpted	Redacted
47.	<i>Mark Underwood</i> , LINKEDIN, website, last visited August 2, 2019		
48.	<i>Stephen Lake</i> , LINKEDIN, website, last visited August 2, 2019		
49.	November 16, 2017 Videotaped Deposition of Dr. Stephen Lake Pages 1, 11, 16, 23, 33, 36-37, 43, 44, 46, 138, 148, 160-161, 178-180, 261-262	Excerpted	Redacted
50.	<i>Michael Panzara</i> , LINKEDIN, website, last visited August 2, 2019		
51.	October 24, 2017 Videotaped Deposition of Michael Panzara, M.D. Pages 1, 14, 18-21, 37, 62-63, 107	Excerpted	Redacted
52.	November 1, 2017 Videotaped Deposition of Jennifer Panagoulas Pages 1, 10-12, 24-25, 73, 159, 164, 191-192, 228	Excerpted	Redacted
53.	<i>Tom Snow</i> , LINKEDIN, website, last visited Sept. 12, 2019		
54.	<i>Carole Huntsman</i> , LINKEDIN, website, last visited Sept. 12, 2019		
55.	September 5, 2018 Deposition of Jerome Contamine – Volume I Pages 1, 292	Excerpted	

Exhibit	Description	Partial Exhibit¹	Filed Under Seal²
56.	July 17, 2018 Deposition of William J. Sibold Pages 1, 17, 18, 21, 68, 75, 77, 100-101, 143-144, 177, 185, 229-230	Excerpted	Redacted
57.	June 22, 2018 Videotaped Deposition of Thomas J. Snow Pages 1, 8-11	Excerpted	
58.	May 8, 2018 Videotaped Deposition of Carole Huntsman Pages 1, 34, 35, 80-81, 144, 194-195, 198-199, 254-256	Excerpted	Redacted
59.	Plaintiff UMB Bank, N.A., as Trustee's Responses and Objections to Defendant's First Set of Requests for Admission (December 20, 2018)		
60.	[REDACTED]		Yes
61.	[REDACTED]	Excerpted (SAN-CVR 013627968 to SAN-CVR 013627996)	Yes
62.	[REDACTED]		Yes
63.	[REDACTED]		Yes
64.	[REDACTED]		Yes
65.	[REDACTED]		Yes
66.	[REDACTED]	Excerpted (SAN-CVR 019339499 to SAN-CVR 019339519)	Yes









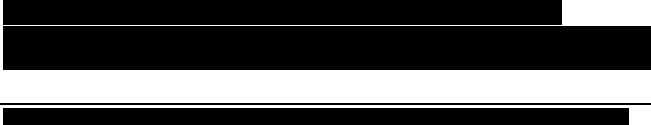



Exhibit	Description	Partial Exhibit ¹	Filed Under Seal ²
67.		Excerpted (SAN-CVR 011688133 to SAN-CVR 011688161)	Yes
68.			Yes
69.		Excerpted (SAN-CVR 019819745 to SAN-CVR 019819746)	Yes
70.		Excerpted (SAN-CVR 016636128 to SAN-CVR 016636145)	Yes
71.		Excerpted (SAN-CVR 013567895 to SAN-CVR 013567930)	Yes
72.		Excerpted (SAN-CVR 012986405 to SAN-CVR 012986409)	Yes
73.			Yes
74.			Yes
75.			Yes
76.		Excerpted (SAN-CVR 016522111 to SAN-CVR 016522194)	Yes
77.		Excerpted (SAN-CVR 013048879 to SAN-CVR 013048885)	Yes
78.		Excerpted (SAN-CVR 011002038 to SAN-CVR 011002224)	Yes













Exhibit	Description	Partial Exhibit ¹	Filed Under Seal ²
79.		Excerpted (SAN-CVR 011016760 to SAN-CVR 011016946)	Yes
80.			Yes
81.			Yes
82.		Excerpted (SAN-CVR 011935545 to SAN-CVR 011935608)	Yes
83.		Excerpted (SAN-CVR 013299934 to SAN-CVR 013300024)	Yes
84.		Excerpted (SAN-CVR 013548762 to SAN-CVR 013548930)	Yes
85.			Yes
86.		Excerpted (SAN-CVR 012982192 to SAN-CVR 012982272)	Yes
87.		Excerpted (SAN-CVR 012464536 to SAN-CVR 012464727)	Yes
88.		Excerpted (SAN-CVR 013372471 to SAN-CVR 013372542)	Yes
89.			Yes
90.			Yes





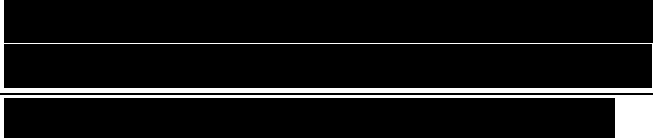
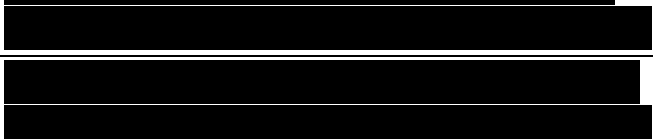
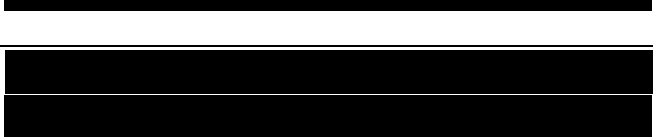


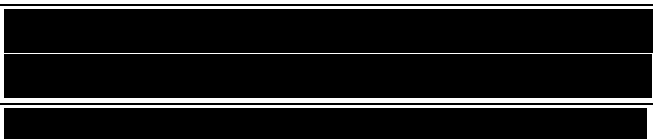
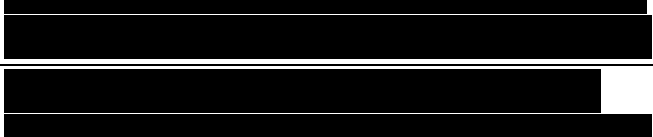


Exhibit	Description	Partial Exhibit ¹	Filed Under Seal ²
91.			Yes
92.			Yes
93.			Yes
94.			Yes
95.			Yes
96.			Yes
97.		Excerpted (SAN-CVR 011719405 to SAN-CVR 011719434)	Yes
98.			Yes
99.			Yes
100.			Yes
101.			Yes
102.			Yes
103.			Yes

Exhibit	Description	Partial Exhibit¹	Filed Under Seal²
104.	[REDACTED]	Excerpted (SAN-CVR 012627846 to SAN-CVR 012628262)	Yes
105.	[REDACTED]		Yes
106.	[REDACTED]		Yes
107.	[REDACTED]		Yes
108.	[REDACTED]		Yes
109.	[REDACTED]		Yes
110.	[REDACTED]	Excerpted (SAN-CVR 020976818 to SAN-CVR 020976823)	Yes
111.	[REDACTED]		Yes
112.	[REDACTED]		Yes
113.	[REDACTED]		Yes
114.	[REDACTED]		Yes
115.	May 3, 2018 Videotaped Deposition of Pamela Williamson Pages 1, 43, 91, 159-160, 217-272	Excerpted	Redacted
116.	[REDACTED]		Yes

Exhibit	Description	Partial Exhibit ¹	Filed Under Seal ²
117.	[REDACTED]		Yes
118.	[REDACTED]		Yes
119.	[REDACTED]	Excerpted (SAN-CVR 014307689 to SAN-CVR 014307690)	Yes
120.	[REDACTED]	Excerpted (SAN-CVR 013952588 to SAN-CVR 013952590)	Yes
121.	[REDACTED]		Yes
122.	<i>Primary Progressive MS (PPMS)</i> , NATIONAL MULTIPLE SCLEROSIS SOCIETY, available at https://www.nationalmssociety.org/What-is-MS/Types-of-MS/Primary-progressive-MS , last visited August 29, 2019		
123.	[REDACTED]	Excerpted (SAN-CVR 015176808 to SAN-CVR 015176814)	Yes
124.	[REDACTED]		Yes
125.	[REDACTED]		Yes
126.	[REDACTED]		Yes
127.	[REDACTED]		Yes
128.	[REDACTED]		Yes

Exhibit	Description	Partial Exhibit ¹	Filed Under Seal ²
129.	[REDACTED]		Yes
130.	[REDACTED]	Excerpted (SAN-CVR 019185362 to SAN-CVR 019185630)	Yes
131.	<i>FDA Approves New Drug to Treat Multiple Sclerosis</i> , U.S. FOOD & DRUG ADMINISTRATION (Mar. 29, 2017), available at https://www.fda.gov/news-events/press-announcements/fda-approves-new-drug-treat-multiple-sclerosis , last visited September 12, 2019		
132.	<i>Roche's Ocrevus Continues Winning Streak as NICE Flip-Flops on Initial Rejection</i> , FIERCEPHARMA (May 9, 2019), available at https://www.fiercepharma.com/pharma/roche-genentech-s-ocrevus-continues-winning-streak-after-nice-flip-flops-initial-guidance , last visited September 12, 2019		
133.	[REDACTED]	Excerpted (SAN-CVR 016031575 to SAN-CVR 016031615)	Yes
134.	[REDACTED]		Yes
135.	[REDACTED]		Yes
136.	[REDACTED]		Yes
137.	[REDACTED]		Yes
138.	[REDACTED]		Yes

Exhibit	Description	Partial Exhibit ¹	Filed Under Seal ²
139.	[REDACTED]		Yes
140.	[REDACTED]		Yes
141.	<i>Development & Approval Process (Drugs)</i> , U.S. FOOD & DRUG ADMINISTRATION (last updated June 13, 2018), available at https://www.fda.gov/drugs/developmentapprovalprocess/default.htm , last visited September 12, 2019		
142.	[REDACTED]		Yes
143.	[REDACTED]		Yes
144.	[REDACTED]		Yes
145.	<i>Open Label Study</i> , NATIONAL CANCER INSTITUTE, available at https://www.cancer.gov/publications/dictionaries/cancer-terms/def/open-label-study , last visited September 3, 2019		
146.	<i>Blind Study</i> , MEDICAL DICTIONARY, available at https://medical-dictionary.thefreedictionary.com/blind+study , last visited September 3, 2019		
147.	[REDACTED]	Excerpted (SAN-CVR 010980257 to SAN-CVR 010980337)	Yes
148.	[REDACTED]		Yes

Exhibit	Description	Partial Exhibit ¹	Filed Under Seal ²
149.	FDA Licensing Rule, 21 C.F.R. § 601.20, available at https://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfr/CFRSearch.cfm?fr=601.20 , last visited September 13, 2019		
150.	FDA Licensing Rule, 21 C.F.R. § 601.12, available at https://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfr/CFRSearch.cfm?fr=601.12 , last visited September 13, 2019		
151.	[REDACTED]		Yes
152.	FDA Applications for FDA Approval to Market a New Drug Rule, 21 C.F.R. § 314.126, available at https://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfr/cfrsearch.cfm?fr=314.126 , last visited September 13, 2019		
153.	[REDACTED]		Yes
154.	[REDACTED]		Yes
155.	[REDACTED]		Yes
156.	[REDACTED]		Yes
157.	[REDACTED]		Yes
158.	[REDACTED]	Excerpted	Yes

Exhibit	Description	Partial Exhibit ¹	Filed Under Seal ²
159.	[REDACTED]		Yes
160.	[REDACTED]		Yes
161.	[REDACTED]		Yes
162.	<i>Genzyme Receives Complete Response Letter from FDA on Lemtrada (alemtuzumab) Application</i> , SANOFI GENZYME WEBSITE (Dec. 30, 2013), available at https://www.sanofigenzyme.com/en/about-us/newsroom/archive/2013/2013-12-30-01-02-00 , last visited September 12, 2019		
163.	[REDACTED]		Yes
164.	[REDACTED]		Yes
165.	<i>Genzyme's Lemtrada Approved by the FDA</i> , SANOFI GENZYME WEBSITE (Nov. 14, 2014), available at https://news.genzyme.com/press-release/genzymes-lemtrada-approved-fda , last visited September 13, 2019		
166.	[REDACTED]		Yes
167.	[REDACTED]		Yes

Exhibit	Description	Partial Exhibit ¹	Filed Under Seal ²
168.	Statistical Review and Evaluation, Clinical Studies, <i>sBLA of Natalizumab</i> (2005), available at https://wayback.archive-it.org/7993/20170405065340/https://www.fda.gov/ohrms/dockets/ac/06/briefing/2006-4208B1_01_05FDAStatistical%20review.pdf , last visited September 12, 2019		
169.	[REDACTED]		Yes
170.	[REDACTED]	Excerpted (SAN-CVR 014759929 to SAN-CVR 014760214)	Yes
171.	[REDACTED]		Yes
172.	Jiameng Zhang et al., <i>EDSS variability before randomization may limit treatment discovery in primary progressive MS</i> , MULTIPLE SCLEROSIS JOURNAL (Date Received: Apr. 24, 2012), available at https://www.researchgate.net/publication/231742503_EDSS_variability_before_randomization_may_limit_treatment_discovery_in_primary_progressive_MS , last visited September 13, 2019		
173.	[REDACTED]		Yes
174.	[REDACTED]	Excerpted (SAN-CVR 018309508 to SAN-CVR 018309786)	Yes
175.	[REDACTED]		Yes
176.	[REDACTED]		Yes

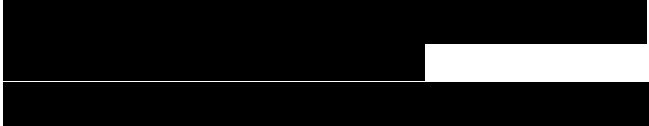







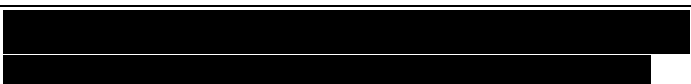



Exhibit	Description	Partial Exhibit ¹	Filed Under Seal ²
177.			Yes
178.			Yes
179.			Yes
180.			Yes
181.			Yes
182.			Yes
183.			Yes
184.			Yes
185.			Yes
186.			Yes
187.		Excerpted (SKP000001 to SKP000261)	Yes
188.			Yes

Exhibit	Description	Partial Exhibit ¹	Filed Under Seal ²
189.	[REDACTED]	Excerpted (SAN-CVR 012051278 to SAN-CVR 012051307)	Yes
190.	[REDACTED]	Excerpted (SAN-CVR 010784722 to SAN-CVR 010784796)	Yes
191.	[REDACTED]	Excerpted (SAN-CVR 012650905 to SAN-CVR 012650921)	Yes
192.	[REDACTED]		Yes
193.	[REDACTED]		Yes
194.	[REDACTED]	Excerpted (SAN-CVR 020223180 to SAN-CVR 020223208)	Yes
195.	[REDACTED]		Yes
196.	<i>Alemtuzumab</i> , COMMISSION DE LA TRANSPARENCE (Oct. 3, 2018), available at https://www.has-sante.fr/upload/docs/evamed/CT-16924_LEMTRADA_PICr%C3%A9%C3%A9val_a_vis3_CT16924%20(2).pdf , last visited September 12, 2019		
197.	[REDACTED]	Excerpted (SAN-CVR 022141460 to SAN-CVR 022141465)	Yes
198.	[REDACTED]		Yes
199.	[REDACTED]		Yes














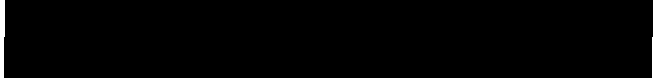
Exhibit	Description	Partial Exhibit ¹	Filed Under Seal ²
200.			Yes
201.			Yes
202.			Yes
203.			Yes
204.			Yes
205.		Excerpted (SAN-CVR 010973216 to SAN-CVR 010973311)	Yes
206.			Yes
207.			Yes
208.			Yes
209.			Yes
210.			Yes
211.			Yes
212.			Yes
213.			Yes

Exhibit	Description	Partial Exhibit ¹	Filed Under Seal ²
214.	[REDACTED]	Excerpted (SAN-CVR 016102085 to SAN-CVR 016102151)	Yes
215.	[REDACTED]		Yes
216.	[REDACTED]		Yes
217.	[REDACTED]		Yes
218.	[REDACTED]		Yes
219.	[REDACTED]		Yes
220.	[REDACTED]		Yes
221.	[REDACTED]		Yes
222.	[REDACTED]		Yes
223.	[REDACTED]		Yes
224.	[REDACTED]		Yes
225.	[REDACTED]		Yes
226.	[REDACTED]		Yes
227.	[REDACTED]		Yes
228.	[REDACTED]		Yes

Exhibit	Description	Partial Exhibit ¹	Filed Under Seal ²
229.	[REDACTED]		Yes
230.	[REDACTED]		Yes
231.	[REDACTED]		Yes
232.	[REDACTED]		Yes
233.	[REDACTED]		Yes
234.	[REDACTED]		Yes
235.	[REDACTED]		Yes
236.	[REDACTED]		Yes
237.	[REDACTED]		Yes
238.	[REDACTED]		Yes
239.	[REDACTED]	Excerpted (SAN-CVR 017883097 to SAN-CVR 017883152)	Yes
240.	[REDACTED]	Excerpted (SAN-CVR 014751389 to SAN-CVR 014751447)	Yes
241.	[REDACTED]	Excerpted (SAN-CVR 013367428 to SAN-CVR 013367577)	Yes
242.	[REDACTED]	Excerpted (SAN-CVR 014688672 to SAN-CVR 014688737)	Yes

Exhibit	Description	Partial Exhibit ¹	Filed Under Seal ²
243.	[REDACTED]		Yes
244.	[REDACTED]	Excerpted (SAN-CVR 011630787 to SAN-CVR 011630830)	Yes
245.	[REDACTED]		Yes
246.	[REDACTED]		Yes
247.	[REDACTED]	Excerpted (SAN-CVR 011833494 to SAN-CVR 011833665)	Yes
248.	[REDACTED]		Yes
249.	[REDACTED]		Yes
250.	[REDACTED]		Yes
251.	[REDACTED]		Yes
252.	[REDACTED]	Excerpted (SAN-CVR 014762039 to SAN-CVR 014762115)	Yes
253.	[REDACTED]		Yes
254.	Carly Helfand, <i>The Bright Side to Sanofi's Lemtrada Delay? Its Support-to-Sell Marketing Plan</i> , FIERCEPHARMA (Dec. 23, 2014), available at https://www.fiercepharma.com/sales-and-marketing/bright-side-to-sanofi-s-lemtrada-delay-its-support-to-sell-marketing-plan , last visited September 13, 2019		











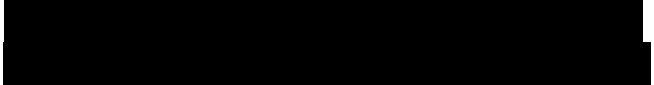


Exhibit	Description	Partial Exhibit ¹	Filed Under Seal ²
255.		Excerpted (SAN-CVR 014888538 to SAN-CVR 014888602)	Yes
256.			Yes
257.		Excerpted (SAN-CVR 01277630 to SAN-CVR 012772742)	Yes
258.		Excerpted (SAN-CVR 011621391 to SAN-CVR 011621397)	Yes
259.			Yes
260.	 9)		Yes
261.			Yes
262.			Yes
263.			Yes
264.			Yes
265.			Yes
266.			Yes
267.			Yes

Exhibit	Description	Partial Exhibit ¹	Filed Under Seal ²
268.	[REDACTED]	Excerpted (MDYS SANOFI 000107 to MDYS SANOFI 000320)	Yes
269.	Cerezyme [®] , available at https://www.cerezyme.com/ last visited June 27, 2019		
270.	<i>Genetics Home Reference: Gaucher disease</i> , NATIONAL INSTITUTE OF HEALTH, available at https://ghr.nlm.nih.gov/condition/gaucher-disease , last visited June 27, 2019		
271.	<i>What Is Gaucher Disease?</i> , NATIONAL GAUCHER FOUNDATION, available at https://www.gaucherdisease.org/about-gaucher-disease/what-is/ , last visited June 27, 2019		
272.	<i>Proposed Text of the Labelling of the Drug, Cerezyme</i> (March 2003) available at https://www.accessdata.fda.gov/drugsatfda_docs/label/2005/20367s0661bl.pdf , last visited September 13, 2019		
273.	Fabrazyme [®] , available at https://www.fabrazyme.com , last visited June 27, 2019		
274.	<i>What is Fabry Disease</i> , FABRY SUPPORT & INFORMATION GROUP (FSIG), available at http://www.fabry.org/fsig.nsf/pages/fabry , last visited June 27, 2019		
275.	[REDACTED]	Excerpted (Evercore-UMB-00018877 to Evercore-UMB-00018981)	Yes
276.	SANOFI-GENZYME, <i>Press Release: Genzyme Reports Progress Related to Allston Plant</i> (June 25, 2009), available at https://news.genzyme.com/press-release/genzyme-reports-progress-related-allston-plant , last visited September 13, 2019		

Exhibit	Description	Partial Exhibit¹	Filed Under Seal²
277.	[REDACTED]	Excerpted (SAN-CVR 010777976 to SAN-CVR 010778009)	Yes
278.	[REDACTED]		Yes
279.	[REDACTED]	Excerpted (WGM-CVR 00041978 to WGM-CVR 00042027)	Yes
280.	[REDACTED]		Yes
281.	[REDACTED]		Yes
282.	[REDACTED]		Yes
283.	[REDACTED]	Excerpted (Evercore-UMB-00015892 to Evercore-UMB-00015898)	Yes
284.	[REDACTED]		Yes
285.	[REDACTED]		Yes
286.	October 12, 2018 Videotaped Deposition of William Aitchison Pages 1, 24-25, 109, 190-91	Excerpted	Redacted
287.	August 29, 2018 Videotaped Deposition of Sandra Poole Pages 1, 179, 247-48, 286-87	Excerpted	
288.	[REDACTED]		Yes

Exhibit	Description	Partial Exhibit ¹	Filed Under Seal ²
289.	[REDACTED]		Yes
290.	October 19, 2018 Videotaped Deposition of Martin Solberg Pages 1, 230-231	Excerpted	Redacted
291.	[REDACTED]		Yes
292.	[REDACTED]		Yes
293.	[REDACTED]		Yes
294.	[REDACTED]	Excerpted (SAN-CVR 022027704 to SAN-CVR 022027705)	Yes
295.	[REDACTED]		Yes
296.	[REDACTED]		Yes
297.	[REDACTED]		Yes
298.	[REDACTED]		Yes
299.	[REDACTED]		Yes
300.	[REDACTED]		Yes
301.	Instrument of Appointment and Acceptance, dated June 30, 2016 (ECF No. 54-1)		

Exhibit	Description	Partial Exhibit¹	Filed Under Seal²
302.	Plaintiff's Exhibit 529, Excerpts of Sanofi-Aventis, Form F-4 Registration Statement Under the Securities Act of 1933, dated March 7, 2011 Pages 1-9, 94-102	Excerpted	